5/14/10 - MD
5/24/10 - RD

NPDES Permit Tracking No:
MAR05CY84

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Wte Recycling Inc

2. NPDES Permit Tracking No.: MAR05CY84

3. Facility Physical Address:

a. Street: 75 SOUTHERN AVE

b. City: GREENFIELD c. State: MA d. Zip Code: 01301-3913

4. Lead Inspector's Name: JOCLAIBORNE THORNTON Title: CONSULTANT

Additional Inspectors Name(s): EDWARD WRISLEY CHARLES FAULSTICH

5. Contact Person: CHARLES FAULSTICH Title: SR ENGINEER

Phone: 781-275-6400 Ext. 111 E-mail: CFAULSTICH@WTE.COM

6. Inspection Date: 11/19/2009

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☑ YES ☐ NO

If NO, describe why not:

NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☒ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

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MAR05CY84

G. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA 1:

1. Brief Description:

Entire metals recycling facility

2. Are any control measures in need of maintenance or repair? ☐ YES ☒ NO
3. Have any control measures failed and require replacement? ☐ YES ☒ NO
4. Are any additional/revised control measures necessary in this area? ☒ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

Benchmark exceedence

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO
3. Have any control measures failed and require replacement? ☐ YES ☐ NO
4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO
3. Have any control measures failed and require replacement? ☐ YES ☐ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No:
MAR05CY84

b. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 1 of 1 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☒ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitates change in control measures
- ☒ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Benchmark exceedence

5. Date problem identified: 07/06/2009

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☒ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures; analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

See attached Quarterly Stormwater Benchmark Monitoring Reports 1 – 4.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☒ NO

9. Date corrective action initiated: 07/17/2009

10. Date corrective action completed: ___/___/____ or expected to be completed: ___/___/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps including timelines associated with each step necessary to complete corrective action:

Bin covers will be added over time. A covered bin for PIF is scheduled for construction in 2010. A Test Hydrokleen catch basin insert will be installed in May 2010 to determine its effectiveness. Additional testing at catchbasins will be conducted this summer as storm events allow.

NPDES Permit Tracking No:
MAR05CY94

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☒ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Charles Faulstich Title: Sr. Engineer

Signature: Charles Faulstich Date Signed: 4/30/10

STORM WATER POLLUTION PREVENTION PLAN

ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION

Instructions: The comprehensive site compliance evaluation is required to inspect and assess the effectiveness of the SWPPP.

1. This inspection must be conducted annually by one or more qualified employees or designated representatives that are knowledgeable of the Facility's industrial activity and SWPPP requirements.
2. Inspect the facility using the Quarterly Inspection Checklist, particularly focusing on the exposed materials, structural controls, BMPs, housekeeping, spill prevention, and the area immediately downstream of the Facility's outfall(s).
3. Thoroughly review all records required as part of the Permit and SWPPP.
4. Complete this report and attach a narrative discussion of the compliance with the SWPPP.
5. Provide remedy for any SWPPP non-compliance discovered and update the SWPPP as required.
6. Keep the report with the SWPPP.

Part 1 — General Information

Facility:	wTe Recycling		
Site Compliance Evaluation Date:	11/13/08	Site Inspection Date:	11/13/08
Inspector Name(s) and Title:	J. Claiborne Thornton III, P. E. , V. P. of W. Z. Baumgartner & Assoc., Inc		
Inspector Signature:			
Facility Representative:	Ed Wrisely and SWPPP Team		

Part 2 — Site Inspection Evaluation

Assessment of Areas Contributing to a Storm Water Discharge

☒ Y ☐ N	Were all areas of exposed materials evaluated?
☒ Y ☐ N	Is the SWPPP inventory of exposed materials current?
☐ Y ☒ N	Is there evidence of pollutants entering the drainage system that may cause non-compliance with the SWPPP?
☐ Y ☒ N	Are there prohibited materials or unpermitted non storm water discharges?
☐ Y ☒ N	Are there any instances of noncompliance with the SWPPP related to exposed materials?

WZB Proj. #: 24113
Date: 11/13/08

Part 2 — Site Inspection Evaluation	
Assessment of Structural Controls	
☒ Y ☐ N ☐NA	Were all structural controls inspected?
☒ Y ☐ N ☐NA	Are structural controls used at the facility effective?
☒ Y ☐ N ☐NA	Are they properly maintained?
☐ Y ☒ N ☐NA	Are new or improvements required to structural control?
☐ Y ☒ N ☐NA	Are there any instances of noncompliance with the SWPPP related to structural controls?
Assessment of Non-Structural Controls	
☒ Y ☐ N ☐NA	Were all non-structural controls evaluated?
☒ Y ☐ N ☐NA	Are non-structural BMPs used at the Facility being implemented?
☒ Y ☐ N ☐NA	Are good housekeeping measures being implemented?
☒ Y ☐ N ☐NA	Are spill prevention measures being implemented?
☒ Y ☐ N ☐NA	Are the non-structural controls effective? (If NO, indicated which _____)
☐ Y ☒ N ☐NA	Are there any instances of noncompliance with the SWPPP related to non-structural controls?
Assessment of Downstream Areas	
☒ Y ☐ N ☐NA	Were all areas downstream of facility outfalls that are reasonably accessible inspected?
☒ Y ☐ N ☐NA	Are erosion and sediment controls for the facility protecting downstream watersheds?
☐ Y ☒ N ☐NA	Is there evidence of pollutants leaving the site that may cause non-compliance with the SWPPP?

WZB Proj. #: 24113
Date: 11/13/08

Part 2 — Site Inspection Evaluation	
Assessment of SWPPP Records	
☒ Y ☐ N ☐NA	Were the required modifications from the previous Annual Comprehensive Site Evaluation implemented?
☒ Y ☐ N ☐NA	Were the Quarterly Inspections completed for the last year?
☒ Y ☐ N ☐NA	Were the Quarterly Visual Monitoring events completed for the last year?
☐ Y ☐ N ☒ NA	Were the required Benchmark analytical monitoring events completed for the past year?
☐ Y ☐ N ☐NA	Were the required numeric limitation monitoring events for the past year completed?
☐ Y ☐ N ☐NA	Were the required actions taken based the sampling results?
☒ Y ☐ N ☐NA	Are all monitoring and inspection reports included with the SWPPP (at least 3 years)?
☒ Y ☐ N ☐NA	Is the Spill Log up to date, accurate, and complete?
☒ Y ☐ N ☐NA	Are training records complete and up to date?
☒ Y ☐ N ☐NA	Is the non-storm water discharge inspection complete and accurate?
☒ Y ☐ N ☐NA	Is the SWPPP Certification signed by the appropriate company official?
☒ Y ☐ N ☐NA	Is the SWPPP Team roster correct and up to date?
☐ Y ☒ N ☐NA	Do any records show the Facility is non-compliant with the SWPPP or Permit requirements?

WZB Proj. #: 24113
Date: 11/13/08

Part 3 — SWPPP Revision	
☐ Y ☒ N ☐NA	Do any elements of the SWPPP required modification to improve effectiveness?
☐ Y ☐ N ☐NA	Are there any additional elements (e.g., structural modifications or BMPs) that should be added or modified for pollution prevention?
☐ Y ☒ N ☐NA	Does the site map need to be updated?
☐ Y ☒ N ☐NA	Does the inventory of exposed materials need to be updated?
☐ Y ☒ N ☐NA	Does the description of good housekeeping measures need to be updated?
☐ Y ☒ N ☐NA	Does the description of structural controls need to be updated?
☐ Y ☒ N ☐NA	Does the description of non-structural controls need to be updated?
☐ Y ☒ N ☐NA	Does any other element of the plan found to be inaccurate or need modification?

Element of SWPPP to be modified	Date Complete (30 days allowed)

WZB Proj. #: 24113
Date: 11/13/08

Part 4 — Compliance Evaluation Results Incidents of Noncompliance		
Incident	Necessary Action	Date To Complete*

*All noncompliance must be remedied within 12 weeks unless extension is granted.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signed:	
Print Name:	
Title:	
Date:	
☐	This Annual Comprehensive Site Evaluation has determined that this facility is in compliance with the SWPPP.

W. Z. BAUMGARTNER & ASSOCIATES, INC.

ENVIRONMENTAL ENGINEERS AND CONSULTANTS

P.O. BOX 680369 • FRANKLIN, TN 37068-0369
1113 MURFREESBORO RD., SUITE 310 • FRANKLIN, TN 37064
615-595-0025 • FAX 615-595-1595

LETTER OF TRANSMITTAL

TO: Mr. Ed Wrisley, General Manager wTe Recycling, Inc. 75 Southern Avenue Greenfield, MA 01301-3913	DATE December 28, 2009 PROJECT NO. 24113 RE:

WE ARE SENDING YOU: ☒ Attached ☐ Previously faxed ☐ Under separate cover
VIA: ☐ Overnight ☐ 2nd Day ☒ Regular Mail

THE FOLLOWING ITEMS: ☒ Exhibits ☐ Shop Drawings ☐ Permit Applications
☐ Reports ☐ Survey ☐ Change Order
☐ Plans ☐ Specifications ☐ Other

COPIES	DATE	PGS.	DESCRIPTION
2	11/19/09		Annual Comprehensive Site Compliance Evaluation
2	11/19/09		Facility Map

THESE ARE TRANSMITTED as checked below:
☐ For approval ☐ Approved as submitted ☐ Resubmit ____ copies for approval
☒ For your use ☐ Approved as noted ☐ Submit ____ copies for distribution
☐ As requested ☐ Returned for corrections ☐ Return ____ corrected prints
☐ For your information ☐ Returned report

REMARKS: Please review and sign page 5 of evaluation and place into your SWPPP. Replace facility map with enclosed. Please call if you have any questions.

COPY TO:

SIGNED: J. Claiborne Thornton III

J. Claiborne Thornton III, P.E.
Vice President

p

If enclosures are not enclosed, kindly notify us at once.

STORM WATER POLLUTION PREVENTION PLAN

ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION

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2. Inspect the facility using the Quarterly Inspection Checklist, particularly focusing on the exposed materials, structural controls, BMPs, housekeeping, spill prevention, and the area immediately downstream of the Facility's outfall(s).
3. Thoroughly review all records required as part of the Permit and SWPPP.
4. Complete this report and attach a narrative discussion of the compliance with the SWPPP.
5. Provide remedy for any SWPPP non-compliance discovered and update the SWPPP as required.
6. Keep the report with the SWPPP.

Part 1 — General Information

Facility:	wTe Recycling		
Site Compliance Evaluation Date:	11/19/09	Site Inspection Date:	11/19/09
Inspector Name(s) and Title:	J. Claiborne Thornton III, P. E.		
Inspector Signature:	J Claiborne Thornton III		
Facility Representative:	Ed Wrisley		

Part 2 — Site Inspection Evaluation

Assessment of Areas Contributing to a Storm Water Discharge

☒ Y ☐ N	Were all areas of exposed materials evaluated?
☒ Y ☐ N	Is the SWPPP inventory of exposed materials current?
☐ Y ☒ N	Is there evidence of pollutants entering the drainage system that may cause non-compliance with the SWPPP?
☐ Y ☒ N	Are there prohibited materials or unpermitted non storm water discharges?
☐ Y ☒ N	Are there any instances of noncompliance with the SWPPP related to exposed materials?

WZB Proj. #: 24113
Date: 11/19/09

Part 2 — Site Inspection Evaluation	
Assessment of Structural Controls	
☒ Y ☐ N ☐NA	Were all structural controls inspected?
☒ Y ☐ N ☐NA	Are structural controls used at the facility effective?
☒ Y ☐ N ☐NA	Are they properly maintained?
☐ Y ☒ N ☐NA	Are new or improvements required to structural control?
☐ Y ☒ N ☐NA	Are there any instances of noncompliance with the SWPPP related to structural controls?
Assessment of Non-Structural Controls	
☒ Y ☐ N ☐NA	Were all non-structural controls evaluated?
☒ Y ☐ N ☐NA	Are non-structural BMPs used at the Facility being implemented?
☒ Y ☐ N ☐NA	Are good housekeeping measures being implemented?
☒ Y ☐ N ☐NA	Are spill prevention measures being implemented?
☐ Y ☐ N ☐NA	Are the non-structural controls effective? (If NO, indicated which _____)
☐ Y ☐ N ☐NA	Are there any instances of noncompliance with the SWPPP related to non-structural controls?
Assessment of Downstream Areas	
☒ Y ☐ N ☐NA	Were all areas downstream of facility outfalls that are reasonably accessible inspected?
☒ Y ☐ N ☐NA	Are erosion and sediment controls for the facility protecting downstream watersheds?
☐ Y ☒ N ☐NA	Is there evidence of pollutants leaving the site that may cause non-compliance with the SWPPP?

WZB Proj. #: 24113
Date: 11/19/09

Part 2 — Site Inspection Evaluation	
Assessment of SWPPP Records	
☒ Y ☐ N ☐NA	Were the required modifications from the previous Annual Comprehensive Site Evaluation implemented?
☒ Y ☐ N ☐NA	Were the Quarterly Inspections completed for the last year?
☒ Y ☐ N ☐NA	Were the Quarterly Visual Monitoring events completed for the last year?
☒ Y ☐ N ☐NA	Were the required Benchmark analytical monitoring events completed for the past year?
☒ Y ☐ N ☐NA	Were the required numeric limitation monitoring events for the past year completed?
☒ Y ☐ N ☐NA	Were the required actions taken based the sampling results?
☒ Y ☐ N ☐NA	Are all monitoring and inspection reports included with the SWPPP (at least 3 years)?
☒ Y ☐ N ☐NA	Is the Spill Log up to date, accurate, and complete?
☒ Y ☐ N ☐NA	Are training records complete and up to date?
☒ Y ☐ N ☐NA	Is the non-storm water discharge inspection complete and accurate?
☒ Y ☐ N ☐NA	Is the SWPPP Certification signed by the appropriate company official?
☒ Y ☐ N ☐NA	Is the SWPPP Team roster correct and up to date?
☒ Y ☐ N ☐NA	Do any records show the Facility is non-compliant with the SWPPP or Permit requirements?

WZB Proj. #: 24113
Date: 11/19/09

Part 3 — SWPPP Revision	
☐ Y ☒ N ☐NA	Do any elements of the SWPPP required modification to improve effectiveness?
☐ Y ☒ N ☐NA	Are there any additional elements (e.g., structural modifications or BMPs) that should be added or modified for pollution prevention?
☐ Y ☒ N ☐NA	Does the site map need to be updated?
☐ Y ☒ N ☐NA	Does the inventory of exposed materials need to be updated?
☐ Y ☒ N ☐NA	Does the description of good housekeeping measures need to be updated?
☐ Y ☒ N ☐NA	Does the description of structural controls need to be updated?
☐ Y ☒ N ☐NA	Does the description of non-structural controls need to be updated?
☒ Y ☐ N ☐NA	Does any other element of the plan found to be inaccurate or need modification?

Element of SWPPP to be modified	Date Complete (30 days allowed)

WZB Proj. #: 24113
Date: 11/19/09

Part 4 — Compliance Evaluation Results Incidents of Noncompliance		
Incident	Necessary Action	Date To Complete*

*All noncompliance must be remedied within 12 weeks unless extension is granted.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signed:	
Print Name:	
Title:	
Date:	
☐	This Annual Comprehensive Site Evaluation has determined that this facility is in compliance with the SWPPP.

Quarter 1 Stormwater Benchmark Monitoring Report, 2009

Sample Obtained: 6/9/2009

Results Received: 7/6/2009

Discovered that exceedence of the 4 quarter averages are mathematically certain: 7/6/2009

Documented this discovery by completing sections D.3 through D.5 of the Annual Reporting Form: 7/7/2009

Conducted meeting to determine corrective action: 7/17/2009

Documented the corrective actions to be taken by completing sections D.7 through D.10 of the Annual Reporting Form: 7/20/2009

Corrective Actions to be Taken to Eliminate of Further Investigate the Problem

Implement Immediately

1. Improve housekeeping by increased road sweeping, increased frequency of cleanup around and on process equipment.
2. Store all finished non-ferrous products under cover.
3. Clean out all manholes quarterly.
4. Remove and consolidate miscellaneous materials ("clutter").
5. Use additional hay bales around catch basins.
6. Minimize the length of time finished ferrous products are stored by moving inventory out as fast as possible.

Implement Over Time

1. Construct covered bins for storage of PIF prior to being processed.
2. Construct concrete trenches around catch basins sized to contain hay bales.
3. Collect stormwater from building roofs and convey it directly to the storm drainage system in stead of allowing it to flow overland.
4. Cover the intermediate Zorba material.
5. Construct covers over the bins on the river side of the rail siding.
6. Replace rail car loading ramp made of compacted frag with a concrete or steel ramp.
7. Construct upper and lower bunkers between the PT building and the large storage building.
8. Cover the ASR pile.

Quarter 2 Stormwater Benchmark Monitoring Report, 2009
wTe Recycling, Inc.

The MSGP requires a corrective action report (1) if the average of four quarterly sampling results exceeds an applicable benchmark, or (2) if fewer than four benchmark samples have been taken and the results are such that an exceedence of the four quarter average is mathematically certain. The corrective action report consists of documenting the discovery within 24 hours of making the discovery, and documenting the corrective action taken or to be taken within 14 days of making the discovery.

Sample Date: September 27, 2009

Sample Analysis Received: October 26, 2009

Documentation of Discovery of Conditions Requiring a Corrective Action Report: October 26, 2009

Documentation of Response to Discovery (due November 9): November 9, 2009

Sample Anaylsis Results Electronically Submitted to EPA (due November 26): Submitted 11/5/2009, Certified 11/13/2009

The sample was not obtained during the first thirty minutes of runoff from the storm because of the timing of the storm. The sample was obtained as soon as was practicable.

Documentation of Discovery

1. The stormwater analysis results for the samples taken on September 27 2009 were obtained from EAI Analytical Labs on October 26, 2009.
2. These results when combined with the results for the first round of sampling are mathematically certain to result in an exceedence of the four quarter average for TSS, aluminum, copper, iron, lead, zinc, and COD.
3. This was identified on October 26, 2009.

Response to Discovery

The following is to be implemented as soon as possible:

Collect stormwater samples at selected catch basins in order to determine the relative contribution of sub drainage areas toward stormwater contamination. Test filtered, unpreserved samples as well as conventional unfiltered, preserved samples to determine how much contamination is of the suspended, filterable type.

The following are to be implemented over time:

1. Construct covered bins for storage of PIF prior to being processed. (See item 7 below).

2. Construct concrete trenches around catch basins sized to contain hay bales.

3. Collect stormwater from building roofs and convey it directly to the storm drainage system instead of allowing it to flow overland.

4. Cover the intermediate Zorba material.

5. Construct covers over the bins on the river side of the rail siding.

6. Replace rail car loading ramp made of compacted shredded steel with a concrete or steel ramp.

7. Construct upper and lower bunkers between the PT building and the large storage building. An engineer will be retained to design a roof structure that will span the area between the upper yard storage bunkers and the PT building. This will provide covered storage for unprocessed PIF and oversize PIF products.

8. Cover the ASR pile. This is a low priority as the ASR is not believed to be a major contributor to stormwater pollution.

Quarter 3 Stormwater Benchmark Monitoring Report, 2009
wTe Recycling, Inc.

The MSGP requires a corrective action report (1) if the average of four quarterly sampling results exceeds an applicable benchmark, or (2) if fewer than four benchmark samples have been taken and the results are such that an exceedence of the four quarter average is mathematically certain. The corrective action report consists of documenting the discovery within 24 hours of making the discovery, and documenting the corrective action taken or to be taken within 14 days of making the discovery.

Sample Date: November 14, 2009

Sample Analysis Received: December 17, 2009

Documentation of Discovery of Conditions Requiring a Corrective Action Report: December 18, 2009

Documentation of Response to Discovery (due December 31): December 18, 2009

Sample Analysis Results Electronically Submitted to EPA (due January 17): Submitted for certification 1/7/2010

Documentation of Discovery

1. The stormwater analysis results for the samples taken on November 14, 2009 were obtained from EAI Analytical Labs on December 17, 2009.
2. These results when combined with the results for the first round of sampling are mathematically certain to result in an exceedence of the four quarter average for TSS, aluminum, copper, iron, lead, zinc, and COD.
3. This was identified on December 17, 2009.

Response to Discovery

Any significant response to this discovery will be made as soon as practical. Because of the onset of winter, additional work and sampling may have to wait until spring. The following is to be implemented as soon as possible:

Collect stormwater samples at selected catch basins in order to determine the relative contribution of sub drainage areas toward stormwater contamination. Test filtered, unpreserved samples as well as conventional unfiltered, preserved samples to determine how much contamination is of the suspended, filterable type.

The following are to be implemented over time:

1. Construct covered bins for storage of PIF prior to being processed. (See item 7 below).

2. Construct concrete trenches around catch basins sized to contain hay bales. One test location will be constructed and evaluated to determine the effectiveness of this design.

3. Collect stormwater from building roofs and convey it directly to the storm drainage system instead of allowing it to flow overland.

4. Cover the intermediate Zorba material.

5. Construct covers over the bins on the river side of the rail siding. This is a low priority item that is not expected to have much effect on stormwater quality.

6. Replace rail car loading ramp made of compacted shredded steel with a concrete ramp.

7. Construct upper and lower bunkers between the PT building and the large storage building. An engineer will be retained to design a roof structure that will span the area between the upper yard storage bunkers and the PT building. This will provide covered storage for unprocessed PIF and oversize PIF products.

8. Cover the ASR pile. This is a low priority as the ASR is not believed to be a major contributor to stormwater pollution.

Quarter 4 Stormwater Benchark Monitoring Report, 2009-2010
wTe Recycling, Inc.

The MSGP requires a corrective action report (1) if the average of four quarterly sampling results exceeds an applicable benchmark, or (2) if fewer than four benchmark samples have been taken and the results are such that an exceedence of the four quarter average is mathematically certain. The corrective action report consists of documenting the discovery within 24 hours of making the discovery, and documenting the corrective action taken or to be taken within 14 days of making the discovery.

Sample Date: March 25, 2010

Sample Analysis Received: April 13, 2010

Documentation of Discovery of Conditions Requiring a Corrective Action Report: April 13, 2010

Documentation of Response to Discovery: April 20, 2010

Sample Anaylsis Results Electronically Submitted to EPA (due May 13): April 29, 2010

Documentation of Discovery

1. The stormwater analysis results for the samples taken on March 25, 2010 were obtained from EAI Analytical Labs on April 13, 2010.
2. The results exceeded the benchmarks for all parameters.
3. This was identified on April 13, 2010.

Response to Discovery

1. Corrective action taken or to be taken - A Hydrokleen catch basin filter insert with a heavy metal filter and a petroleum oil filter will be purchased and evaluated. The sampling option will be purchased, allowing post-filter samples to be collected and evaluated to determine the effectiveness of the filter. If the filter is determined to be effective, additional filters will be purchased for the remainder of the catch basins. Additional bin covers are planned for post-incinerator ash (PIF). Notice of SWPPP modifications - if the Hydrokleen catch basin filter insert is to be a permanent component of the stormwater pollution protection program, the SWPPP will be modified as required.
2. Date corrective action initiated – April 20, 2010 – received quotation on catch basin insert. Design of the bin covers began earlier this year.
3. Date corrective action completed or expected to be completed – Installation of the insert should be completed by May 1, 2010. The bin covers will be completed in calendar year 2010 as soon as possible.